

# **Back from the brink: A case study on transforming health & safety management through enforcement**

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## Background - 2005

**LT Seveso (COMAH) site**

**Small operator – high risks**

- **Highly pyrophoric substances**
- **Electrolysis**
- **Main reaction gives off hydrogen**

**US owned subsidiary – regularly audited  
and award winning**



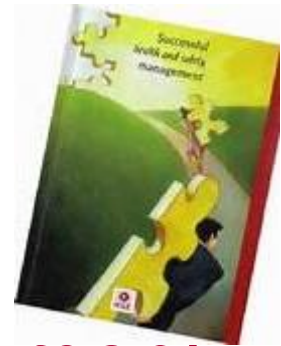
## Start of changes on site

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- 2005 inspection identifies need to improve site process procedures
- Site manager goes on 'gardening leave'
- Early 2006 - Report of burn in electrolysis plant prompts investigation
- Evident no improvement so first piece of enforcement action taken to write appropriate operating procedures (human factors)

## 2007 - Audit

- Based on HSG65 principles – ‘POPMAR’
- 4 days on site – safety management systems and process safety
- Interviews and site tour
- Significant concerns raised during site tour



# What?! Part 1



# What!? Part 2





# Enforcement action

- Six improvement notices:
  - Safety instrumentation system (SIS) assessments
  - SIS testing
  - Main process safety risks
  - Major accident risk assessment
  - SMS arrangements
  - Emergency plan
- Used UK Enforcement Management Model (EMM)



# Company response

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- Senior executive came over from parent company  
“Here’s what’s wrong; Here’s what you need to do; Here’s how you do it”
- Both former site manager and safety manager leave
- Positive response and notices complied with
- New safety manager appointed – ex-production



## Next part of the journey

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- Prosecuted for another burn in 2007 (£13,000 fine)
- Decision made about future of plant – electrolysis closed down, plant stays open
- Re-audited by parent company in 2008 – HSE attends

# 2013



- HSE audits plant again – 2 days on site
- Focused on leadership, worker involvement, training and control of contractors
- Astonishing transformation
  - Better led – visible exemplar
  - End to blame culture – positive attitude to criticism
  - Openness about imperfections
  - ‘Improving health and safety saved this plant’



# Lessons?

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- Prosecution of individuals
- Two faces of a company
- Health and safety culture never in isolation
- Trained to look at rational objects and systems – have to deal with irrational humans
- You reap what you sow

# Questions



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